

**VOLUNTARY SELF DISCLOSURE CASES
FY2008
(12 VSD CASES)**

ORDER DATE	CASE NAME	CHARGES	SECTIONS VIOLATED	RESULT	PENALTY BREAKDOWN
09/12/08	In the Matter of Nalco Company	Exported hardness test kits containing Triethanolamine to the Bahamas, Dominican Republic and Angola without the required licenses	764.2(a) [13]	Settlement Agreement - civil penalty of \$115,000	maximum fine \$260,000* avg. \$8846.15 fine was 44% of the fine *[10 charges @ \$11,000 and 3 charges @ \$50,000]
09/04/08	In the Matter of Gusmer Europe, S.L.	Exported equipment for spray application systems for specialty polymer products to Cuba without the required licenses	764.2(a) [10]	Settlement Agreement - civil penalty of \$40,000	maximum fine \$110,000 avg. \$4,000 fine was 36% of the fine
08/12/08	In the Matter of Reson Offshore Ltd.	Reexported multibeam bathymetry echosounders to South Africa without the required licenses	764.2(a) [2]	Settlement Agreement - civil penalty of \$9,900	maximum fine \$ 22,000 avg. \$4,950 fine was 45% of the fine
08/12/08	In the Matter of Underwater Surveys (Pty) Ltd.	Reexported multibeam bathymetry echosounders to Denmark, Mozambique, the United Arab Emirates, and the United Kingdom without the required licenses	764.2(a) [6]	Settlement Agreement - civil penalty of \$29,700	maximum fine \$66,000 avg. \$4,950 fine was 45% of the fine

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08/12/08	In the Matter of Reson Inc.	Sold, transferred, transported, forwarded, or otherwise serviced, multibeam bathymetry echosounders with knowledge that violations would occur; deemed exports of technology to nationals of France and the United Kingdom in the United States without the required licenses	764.2(e) [6] 764.2(a) [2]	Settlement Agreement - civil penalty of \$83,000	maximum fine \$166,000* avg. \$10,375 fine was 50% of the fine *[6 charges @ \$11,000 and 2 charges @ \$50,000]
08/12/08	In the Matter of Reson A/S.	Reexported and caused, aided or abetted the export of multibeam bathymetry echosounders to India, Russia, Saudi Arabia, South Africa, and through Denmark to Germany, Russia and Singapore without the required licenses	764.2(a) [13] 764.2(b) [4]	Settlement Agreement - civil penalty of \$119,250	maximum fine \$265,000 avg. \$7014.71 fine was 45% of the fine
08/11/08	In the Matter of Advanced Micro Devices	Deemed exports of technology to Ukrainian and Chinese nationals in the United States without the required licenses	764.2(a) [2]	Settlement Agreement - civil penalty of \$11,000	maximum fine \$22,000 avg. \$11,000 fine was 50% of the fine
06/05/08	In the Matter of Andes Chemical Corporation	Exported sodium bifluoride to Jamaica without the required licenses; failed to file SEDs	764.2(a) [8]	Settlement Agreement - civil penalty of \$60,000	maximum fine \$205,000* avg. \$2562.50 fine was 29% of the maximum *[5 charges @ \$11,000 and 3 charges @ \$50,000]

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01/23/08	In the Matter of Northrop Grumman Corporation	Reexported items from the United Kingdom to Italy, Germany and Qatar without the required licenses; violated terms of a license condition; exported specially designed components for navigation equipment to Italy, Malaysia, the Philippines and the United Kingdom without the required licenses; exported module manufacturing data by facsimile transmission to Singapore without the required licenses	764.2(a) [131]	Settlement Agreement - civil penalty of \$400,000	maximum fine \$1,353,000 avg. \$3,053.44 fine was 30% of the maximum
12/07/07	In the Matter of Mine Safety Appliances Company	Reexported various safety equipment items from the UAE to Iran and Syria without the required authorizations	764.2(a) [107]	Settlement Agreement - civil penalty of \$470,000	maximum fine \$1,177,000 avg. \$4,392.52 fine was 40% of the fine
12/21/07	In the Matter of Marubeni-Citizen	Exported machine tools to Mexico and Brazil without the required licenses; made false statement regarding license authority on SED	764.2(a) [3] 764.2(g) [1]	Settlement Agreement - \$32,940	maximum fine \$122,000 avg. \$8,235 fine was 27% of the fine
11/21/07	In the Matter of Lam Research Corporation	Deemed exports of technology to a Russian and Chinese national in the United States without the required licenses; exported manometers to various destinations without the required licenses	764.2(a) [5]	Settlement Agreement - civil penalty of \$27,500 - after filing of charging letter	maximum fine \$55,000 avg. \$5,500 fine was 50% of the maximum